



THE NAVAJO NATION

RUSSELL BEGAYE PRESIDENT
JONATHAN NEZ VICE PRESIDENT



TELECOMMUNICATIONS REGULATORY COMMISSION

Office Of The President and Vice President

*M. Teresa Hopkins
Executive Director*

*Thomacita White
Administrative Assistant*

February 24, 2016

Hon. Thomas Wheeler
Federal Communications Commission
445 Twelfth Street, S.W.
Eighth Floor
Washington, DC 20554

Re: CC Docket 11-42
Lifeline Reform

Dear Chairman Wheeler,

As you know, improving infrastructure on Tribal Lands is a challenge we must continue to meet in the 21st Century. Despite significant gains over the past decade in telephone penetration (see the Comments of my Navajo Nation Telecommunications Regulatory Commission, filed August 28, 2015), broadband availability and adoption on Tribal Lands is not reasonably comparable to that which is available in urban areas of the United States. The Telecommunications Act of 1996 authorized the FCC to improve telecommunications and information services on Tribal Lands, and we commend the Commission's work to increase telephone and Internet access, especially for low-income households. You have spoken frequently of the need to ensure that all Americans have access to high-quality broadband, including residents of Tribal Lands.

We understand that the Commission is in the midst of reforming its Lifeline program and is considering whether to allow program funds to be used for broadband. We think such a step is overdue, and we urge you to consider according special treatment for Tribal residents by increasing Lifeline subsidies on Tribal Lands for wireless technology and broadband access. It should be noted that despite improvements over the past 16 years under Lifeline Tier 4 support, Tribal Lands continue to lag the rest of the US with respect to wireless and broadband access, in particular the unavailability of 3G/4G coverage sufficient to support advanced public safety, telemedicine, and education services, which are urgently needed. More specifically, for more rural Tribal Lands, such as the Navajo Nation, the "Digital Divide" may have narrowed ever so slightly while growing far deeper than any time in the past while surrounding communities reap the benefits from investments in 4G wireless and fiber facilities. For these compelling reasons, and to the extent that funds are available within the current universal service program, we urge you to repurpose them to accelerate investment in broadband on Tribal Lands.

We realize that past pilot programs have failed to quantify how broadband adoption would increase with subsidies. We believe this failure is not a demonstration that Native Americans do not want broadband, but rather a failure to involve the Tribes and Tribal governments in administering those programs. Native Americans look to their elders to understand what programs can benefit them, not some outside broadband provider with a complicated program where some people get one discount, while their neighbors get a different discount. The Navajo government, and my NNTRC, stands ready to assist the FCC in administering a new broadband adoption program, and I challenge you to use the Navajo Nation as a testbed for such a program.

In sum, we ask you to use the opportunity of Lifeline reform to address the chronic and severe broadband infrastructure deficiency suffered by residents of Tribal Lands by increasing Lifeline support for Tribal residents.

Sincerely,

A handwritten signature in dark ink, appearing to read 'M. Teresa Hopkins', with a stylized, overlapping loop at the end.

M. Teresa Hopkins, Executive Director
Navajo Nation Telecommunications
Regulatory Commission

cc: Office of Native Affairs and Policy